From: Tom Keegan

Sent: Tuesday, September 23, 2003 10:50 AM

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Subject: Comments-California Water Plan Update 2003

On Sept. 18, 2003 the Dry Creek Rancheria Band of Pomo Indians Board of Director's motioned to submit the following comments on the. These comments are submitted via this email. Please contact me if you have any questions.

## California Water Plan Update 2003

## **Policy Recommendation Topics**

State recognition of accrued time of waste water treatment operators that work at Tribal waste water treatment plants for State certification to protect water resources.

Tribes in California are now operating sophisticated waste water treatment plants and hiring and training certified operators, including California certified operators, to run such plants. In California, waste water treatment operators are certified by the State Water Resources Control Board (SWRCB). In order to qualify to take the certification exams for various grades of wastewater treatment plant operator certifications, an operator must present hours accrued at a wastewater treatment facility. The SWRCB currently recognizes hours accrued by operators of waste water treatment plants in other states but does not recognize hours accrued by operators of Tribal waste water treatment plant systems. Such unequal treatment between states and Tribes, makes it difficult for Tribes to attract and maintain certified operators. It is in the best interest of both the State and the Tribes for the SWRCB to recognize time accrued by operators on Tribal systems or to grant reciprocity with Tribal certifications. Such recognition or reciprocity would assist Tribes in hiring and maintaining high quality operators to run the waste water treatment plants on the reservations within California and thereby protecting water quality for all Californians. In addition, such recognition or reciprocity would provide additional facilities to train California certified operators.

Thomas Keegan Environmental Planning Director Dry Creek Rancheria